

EXHIBIT 6

Zavalkoff-Babej, Erin

From: Zavalkoff-Babej, Erin
Sent: Wednesday, June 30, 2010 3:35 PM
To: 'mmuise@hmsconsultants.com'; 'john.maher@ngsc.org'
Subject: Language for the Wages Motion

Hi

Below is some suggested language for the prepetition wages motion.

The Debtors believe that the Employee Obligations qualify as priority claims under section 507(a)(4). The Debtors submit, however, that to the extent any Employee is owed in excess of \$10,950 on account of Employee Obligations for Prepetition Compensation, payment of such amounts is necessary and appropriate and is authorized under both section 363(b) and section 105(a) pursuant to the "necessity of payment" doctrine, which "recognizes the existence of the judicial power to authorize a debtor in a reorganization case to pay prepetition claims where such payment is essential to the continued operation of the debtor."

Let me or Derek know if you have any questions.

Erin